

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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UNITED STATES OF AMERICA,	:	
	:	
Plaintiff	:	
	:	
v.	:	Criminal Action No. 20-40-CFC
	:	
Audrey Gibbons,	:	
	:	
Defendant.	:	
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**DEFENDANT’S UNOPPOSED MOTION TO  
EXTEND PRETRIAL MOTIONS DEADLINE**

NOW COMES Defendant Audrey Gibbons by and through her counsel,  
Megan J. Davies, Esq., and hereby submits the following:

1. On November 14, 2024, a grand jury for the District of Delaware returned a multiple count indictment against Audrey Gibbons and others. Ms. Gibbons was charged with one count of conspiracy to commit money laundering (18 U.S.C. § 1956(h)). She was arraigned on December 11, 2024.
2. Prior to arraignment, the undersigned was appointed to represent Ms. Gibbons.
3. The pretrial motions deadline was set for January 20, 2025. On December 18, 2024, discovery was mailed to the undersigned’s office.

4. The discovery package was substantial and is subject to a protective order.

5. The undersigned counsel requested a thirty-day extension. On January 8, 2025, the extension was granted. This Court ordered pretrial motions due by February 19, 2025.

6. Having now had more time to take stock in the case, the undersigned requests additional time to review discovery, and consult with her client, and acquaint herself with Ms. Gibbons' case in order to determine whether pretrial motions are necessary.

7. Additionally, the undersigned requests additional time in order for her to adequately review the discovery with her client, advise her client, and engage in plea negotiations with the Government.

8. The undersigned has requested, and does anticipate, additional discovery in the matter.

9. The undersigned, therefore, requests additional time to attempt to resolve the matter prior to the filing of pretrial motions.

10. Based on the foregoing, the defense respectfully requests an additional 90 days to file pretrial motions. AUSA Meredith Ruggles consents to this request. The defense does not object to the Court excluding this additional time under the Speedy Trial Act. Undersigned counsel contends that the ends of justice served by

the delay outweigh the best interests of the public and the defendant in a speedy trial.

*See* 18 U.S.C. § 3161(h)(7)(A).

Respectfully Submitted,

/s/ Megan J. Davies

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Bar No. 6777

Dated: February 10, 2025